

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN RE:

**SARINA MARIE MARSHALL
GUY OKEEFE Marshall, Jr**

Debtors

In Bankruptcy:

Case No.: 18-55741-tjt
Chapter 7
Hon. Thomas J. Tucker

WENDY TURNER LEWIS, TRUSTEE

Plaintiff,

vs.

Adv. Pro. No. 19-04148-tjt
Hon. Thomas J. Tucker

**GUY OKEEFE MARSHALL, JR., and
JAYNE WOODS,**

Defendants.

ANSWER TO COMPLAINT

NOW COME Defendants GUY OKEEFE MARSHALL, JR. and JAYNE WOODS, by and through their attorneys, GREAT LAKES BANKRUPTCY CENTER, and for their Answer to Complaint state as follows:

JURISDICTION AND VENUE

1. Defendants admit the allegations contained in Paragraph 1 of the Complaint for the reason that said allegations are true.
2. Defendants admit the allegations contained in Paragraph 2 of the Complaint for the reason that said allegations are true.
3. Defendants admit the allegations contained in Paragraph 3 of the Complaint for the reason that said allegations are true.

4. Defendants admit the allegations contained in Paragraph 4 of the Complaint for the reason that said allegations are true.

FACTS

5. Defendants admit the allegations contained in Paragraph 5 of the Complaint for the reason that said allegations are true.
6. Defendants admit the allegations contained in Paragraph 6 of the Complaint for the reason that said allegations are true.
7. Defendants admit the allegations contained in Paragraph 7 of the Complaint for the reason that said allegations are true.
8. Defendants admit the allegations contained in Paragraph 8 of the Complaint for the reason that said allegations are true.
9. Defendants admit the allegations contained in Paragraph 9 of the Complaint for the reason that said allegations are true.
10. Defendants admit the allegations contained in Paragraph 10 of the Complaint for the reason that, upon information and belief, said allegations are true.
11. Defendants admit that Debtor drafted and executed a Quit Claim Deed, however, Defendants deny the remaining allegations contained within Paragraph 11 of the Complaint for the reason that said allegations are untrue. Defendants further state that no property interest was transferred to them, as the deed was never recorded, and they were not placed on notice of any transfer of any purported interest in the subject property.

12. Defendants admit the allegations contained in Paragraph 12 of the Complaint for the reason that, upon information and belief, said allegations are true.

COUNT I – VOIDABLE TRANSFER UNDER 11 U.S.C. 544(a)(3)

Defendants hereby restate and incorporate by reference the proceeding paragraphs, as though fully set forth herein

13. Defendants admit the allegations contained in Paragraph 13 of the Complaint for the reason that said allegations are true.

14. Defendants deny the allegations contained within Paragraph 14 of the complaint for the reason that said allegations are untrue. Defendants further state that the purported “transfer” did not created any unperfected security interest as of the Petition date.

15. Defendants admit the allegations contained in Paragraph 15 of the Complaint for the reason that said allegations are true.

16. Defendants admit the allegations contained in Paragraph 16 of the Complaint for the reason that said allegations are true.

17. Defendants admit the allegations contained in Paragraph 17 of the Complaint for the reason that, upon information and belief, said allegations are true.

18. Defendants admit the allegations contained in Paragraph 18 of the Complaint for the reason that said allegations are true.

19. Defendants deny the allegations contained in Paragraph 19 of the Complaint for the reason that said allegations are untrue. Defendants further state that there was no transfer of interest in the property.

WHEREFORE, Defendants pray that this Honorable Court enter its Order denying the relief sought in Plaintiff's Complaint.

COUNT II – TRANSFEREE LIABILITY UNDER 11 U.S.C. 550

Defendants hereby restate and incorporate by reference the proceeding paragraphs, as though fully set forth herein

20. Defendants deny the allegations contained in Paragraph 20 of the Complaint for the reason that said allegations are untrue.

21. Defendants deny the allegations contained in Paragraph 21 of the Complaint for the reason that said allegations are untrue.

WHEREFORE, Defendants pray that this Honorable Court enter its Order denying the relief sought in Plaintiff's Complaint.

COUNT III – PRESERVATION OF AVOIDED TRANSFER UNDER 11 U.S.C. 551

Defendants hereby restate and incorporate by reference the proceeding paragraphs, as though fully set forth herein

22. Defendants deny the allegations contained in Paragraph 22 of the Complaint for the reason that said allegations are untrue.

WHEREFORE, Defendants pray that this Honorable Court enter its Order denying the relief sought in Plaintiff's Complaint.

Respectfully Submitted,

Great Lakes Bankruptcy Center, PLLC

By: /s/ Shawn J. Coppins
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